

Schruhl, Derek

From: Anderson, Steven J (IHS/DES) <Steven.Anderson@ihs.gov>
Sent: Monday, July 06, 2015 9:55 AM
To: Contreras, Peter; Schruhl, Derek
Cc: Domingo, David
Subject: RE: Cowlitz Tribe UIC Injection System Proposal Update

Hi Peter,

A 3 week turn around is just fine. The protocol Jennifer and I used was we complete our review and provide comments to you in writing. Then you all draft an official response on EPA letter head. Jennifer and I meet a couple times before your official response went out to make sure the technical aspects of the comments were appropriate and consistent with industry standards and the appropriate regulations. I look forward to the package. This will be a big step for the Cowlitz Tribe.

Thanks

Steve

From: Contreras, Peter [mailto:Contreras.Peter@epa.gov]
Sent: Thursday, July 02, 2015 11:44 AM
To: Anderson, Steven J (IHS/DES); Schruhl, Derek
Cc: Domingo, David
Subject: Cowlitz Tribe UIC Injection System Proposal Update

Hi Steve,

Mike Ollivant, Parametrix, called me to provide an update on the Cowlitz Tribe's UIC project. Mike said he intends to submit a package for EPA/IHS review in the next couple of weeks. **I told Mike I would confirm** if we could provide a 2 – 3 week turnaround time frame for comments, so please let me know if that works for you and your folks.

Here's the highlights of our conversation:

- Parametrix has a draft Feasibility Study & 30% design.
- They expect to provide EPA a FS/30% package **on or about July 15, 2015**.
- They are requesting a 2 – 3 week turn around for **EPA and IHS comments (3 weeks from 7/15 would be August 7th)**.
- The FS will include hydrogeologic analysis, including ground water travel times from point of injection to property boundary
- There is about 120 feet of vadose zone between the injection and ground water
- Parametrix said they will be using the Nisqually treatment plant design (same basins, treatment, etc.)
- O&M plan. Mike is asking EPA/IHS to provide comments on what sampling & O&M requirements are recommended/required to receive rule authorization approval from EPA. (e.g., how often & what to sample). Parametrix sees those issues beyond their scope of system design), and suggested we provide comments saying "Here is what EPA has required under other similarly-sized systems."
- The Tribe/Parametrix would like some provisional OK that the project is on track based on the FY/30%. I indicated our substantive comments would hopefully give a clear indication of any concerns, what information we would look for in future submittals.
- The Tribe is expecting to break ground in mid-August to begin mass grading for the construction project. I asked Mike to include an overall project timeline, so we can see critical path and how the UIC inventory fits.

Derek is out of the office today, but will still have the lead for coordinating the review/approval/commens for EPA. Let us know if you have any questions, and whether this review time work for you. I imagine once the documents come in, we would schedule a

meeting or call to discuss substantive comments and coordinate on how comments will be transmitted back to the Tribe, consistent with the protocols you and Jennifer had worked out on previous reviews.

Thanks,

Peter

Peter Contreras | Ground Water Unit | EPA Region 10 Seattle | 206 553 6708